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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|------------------------------------|---|---|
| IN RE: | § | CASE NO. 19-30599-13 |
| | § | |
| Marcus Deshun Furlough, Sr. | § | CHAPTER 13 |
| DEBTOR | § | |
| | § | Pre-Hearing: <u>12/29/2020 at 8:30am</u> |
| | § | |
| | § | Hearing: <u>12/29/2020 at 2:00pm</u> |

MOTION TO VACATE DISMISSAL ORDER AND REINSTATE CHAPTER 13 CASE

TO THE HONORABLE U.S. BANKRUPTCY JUDGE PRESIDING:

Now Comes Debtor, Marcus Deshun Furlough, Sr., and requests an Order Vacating the Dismissal Order and Reinstating the above referenced Chapter 13 Case after Dismissal. Debtor would show the court as follows:

1. Debtor filed a petition under Chapter 13 on 2/20/2019;
2. The Chapter 13 Plan has been confirmed;
3. Debtor was confused about the start of his ACH and failed to make direct payments on time. Debtor's case was dismissed on or about 11/10/2020 due to delinquent Chapter 13 plan payments;
5. Debtor can bring the chapter 13 plan payments current.

WHEREFORE, PREMISES CONSIDERED, Debtor(s) respectfully request the Court to enter an Order Vacating the Dismissal Order and Reinstating the Case and for such other and further relief both at law and in equity to which the court may deem justly entitled.

DATED: November 16, 2020

Respectfully Submitted,

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BY: /s/ Megan Price
Megan Price
SBN: 24065926

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing Motion to Vacate Dismissal Order and reinstate case was either mailed or sent electronically to the parties listed below on November 16, 2020.

Attached Mailing Matrix

/s/ Megan Price
Megan Price

CERTIFICATE OF CONFERENCE

The undersigned Debtors' Counsel hereby certifies a pre-filing conference was not held because it was not possible to confer with all scheduled creditors given the time constraint imposed by Federal Rules of Civil Procedure, Rule 59, requiring that this motion be filed within 10 days of dismissal. It is presumed this motion is opposed.

DATED: November 16, 2020

Respectfully submitted,

/s/ Megan Price
Megan Price